

**Dobson service Plans are neither affordable nor do they
contain a sufficient level of local usage.**

The highest ILEC tariffed local service rate in rural ILEC areas served by Dobson Cellular is \$15.60 – the business rate for Dobson Telephone Company.¹ All of the local service offerings of the rural ILECs include unlimited local usage. An average amount of local usage actually used by rural ILEC customers in Oklahoma is approximately 1500² originating and terminating minutes. By contrast, the service offerings of Dobson Cellular are not reasonably comparable to the ILEC's and therefore are unaffordable if a reasonable level of usage is included. The plans currently offered by Dobson Cellular for which it requests universal service support are:

	Block of Time Rate	Block of Time³ Minutes	Rate for⁴ Minutes Above The Block	Long⁵ Distance Included	Vertical⁶ Services Included
Local Plans	\$29.99	500	39 cents	Ok Svc areas	Yes
	\$59.99	1100	29 cents	Ok Svc areas	Yes
Regional Plans⁷	\$19.99	60	40 or 45 cents	Ok,Tx Panhandle	Yes
	\$29.99	180 or 200	24 or 40 cents	Ok,Tx Panhandle	Yes
	\$39.99	280 or 300	24 or 35 cents	Ok,Tx Panhandle	Yes
	\$49.99	380 or 500	22 or 30 cents	Ok,Tx Panhandle	Yes
	\$59.99	480	22 cents		

¹ The highest rural ILEC residence rate in areas where Dobson Cellular serves is \$12.25 for Canadian Valley. To determine the highest tariffed rate for all of Dobson's service area, the OCC would need to consider the local rates of non-rural carriers.

² This estimate was derived from an analysis of the originating and terminating local usage for Chouteau, Totah and Pine Telephone Companies.

³ Originating and terminating minutes. The block of time minutes vary in certain plans based on the MSA or RSA served by Dobson Cellular.

⁴ The per minute rate above the block of time is charged for each originating and terminating minute. The per minute rate above the block of time varies in certain plans based on the MSA or RSA served by Dobson Cellular.

⁵ Local and Regional plans include calling to differing areas in Texas, depending on the service area. Across America plans include calling on AT&T and Cingular networks.

⁶ Differing plans include differing services.

⁷ Regional plans not available in Dobson's RSA 6 service area.

\$69.99	700	25 cents	Ok,Tx Panhandle	Yes
\$99.99	1000	20 cents	Ok,Tx Panhandle	Yes

**Clear
Across
America
Plans**

\$34.99	250 or 360	39 or 40 cents	Nationwide	Yes
\$44.99	350 or 460	35 or 39 cents	Nationwide	Yes
\$54.99	450 or 600	29 or 35 cents	Nationwide	Yes
\$74.99	650 or 950	29 or 35 cents	Nationwide	Yes
\$99.99	1000 or 1250	25 or 29 cents	Nationwide	Yes

None of Dobson Cellular's local plans provide a universal service product that includes a reasonably comparable level of originating and terminating minutes (the average 1500 minutes used by ILEC customers.⁸) at a rate that is reasonably comparable to the ILECs' basic local rates. Dobson's prices for basic local services that do not include toll calling, range from a low of \$29.99 for 500 minutes to \$59.99 for 1100 minutes. Additional originating and terminating local minutes cost 39 cents per minute for the \$29.99 plan and 29 cents per minute for the \$59.99 plan. In comparison, the highest tariffed rural ILEC rate in the area served by Dobson Cellular is \$15.60 (a business rate). No additional per minute charges are charged by rural ILECs for additional local minutes. As a consequence, none of Dobson's local rate levels are reasonable, nor is a reasonable level of local minutes offered in the service block, in comparison to the ILECs' basic local service plans.

If all of Dobson's plans are evaluated, even though the additional regional and nationwide plans contain long distance calling, and depending on the Dobson Cellular plan selected, Dobson's customers will pay not only the block of time rate ranging from a low of \$19.99 for only 60 minutes to a high of \$99.99 for 1250 minutes but they will also

pay additional per-minute charges ranging from 22 cents to 45 cents per-minute. Again, none of Dobson's regional or nationwide rate plans are reasonably comparable to the ILECs' basic local service plans, and therefore has not demonstrated how the public will benefit from Dobson's proposed service offerings.

⁸ This estimate was derived from an analysis of the originating and terminating local usage for Chouteau, Totah and Pine Telephone Companies.

**USCC's service plans are neither affordable nor do they
contain a sufficient level of local usage.**

The highest ILEC tariffed residential local service rate in rural ILEC service areas in Oklahoma is \$_____. All of the local service offerings of the rural ILECs include unlimited local usage. An average amount of local usage actually used by rural ILEC customers in Oklahoma is approximately 1500⁹ originating and terminating minutes. By contrast, the service offerings of USCC are not reasonably comparable to the ILEC's and therefore are unaffordable if a reasonable level of usage is included. The plans currently offered by USCC for which it requests universal service support are:

Vertical¹³	Block of	Block of Time¹⁰	Rate for¹¹	Long¹²	
	Time Rate	Minutes	Minutes Above The Block	Distance Included	Services Included
Local Plans	\$25.00	125	40 cents	Yes	Yes
	\$35.00	700	40 cents	Yes	Yes
	\$40.00	1100	40 cents	Yes	Yes
	\$50.00	1400	40 cents	Yes	Yes
	\$75.00	1800	30 cents	Yes	Yes
	\$100.00	2200	30 cents	Yes	Yes
	\$140.00	2500	30 cents	Yes	Yes
	\$200.00	3600	30 cents	Yes	Yes

⁹ This estimate was derived from an analysis of the originating and terminating local usage for Chouteau, Totah and Pine Telephone Companies.

¹⁰ Any Time Originating and terminating minutes.

¹¹ The per minute rate above the block of time is charged for each originating and terminating minute.

¹² Local and Regional plans include "long distance calling", but local users will incur a 30 cent per minute charge for expanded calling and local and regional users will incur a 69 cent per minute charge for roaming.

¹³ Differing plans include differing services.

Regional Plans	\$35.00	500	40 cents	Yes	Yes
	\$40.00	650	40 cents	Yes	Yes
	\$50.00	800	40 cents	Yes	Yes
	\$75.00	1300	30 cents	Yes	Yes
	\$100.00	1500	30 cents	Yes	Yes
	\$140.00	2300	30 cents	Yes	Yes
	\$200.00	3300	30 cents	Yes	Yes
Span America Plans	\$35.00	200	40 cents	Yes	Yes
	\$40.00	250	40 cents	Yes	Yes
	\$50.00	400	40 cents	Yes	Yes
	\$75.00	700	30 cents	Yes	Yes
	\$100.00	1000	30 cents	Yes	Yes
	\$140.00	1500	30 cents	Yes	Yes
	\$200.00	2000	30 cents	Yes	Yes

None of USCC's local service plans provide a universal service product that includes a reasonably comparable level of originating and terminating minutes (the average 1500 minutes used by ILEC customers.¹⁴) at a rate that is reasonably comparable to the ILECs basic local rates. USCC's prices for basic local services (that incur a 30 per minute expanded calling charge), range from a low of \$25.00 for 125 minutes to \$200.00 for 3600 minutes. Additional originating and terminating local minutes cost between 30 and 40 cents per minute depending on the local calling plan. In comparison, the highest tariffed rural ILEC residential rate in Oklahoma is \$_____. No additional per minute charges are charged by rural ILECs for additional local minutes. As a consequence, none of USCC's local rate levels are reasonable, nor is a reasonable level of local minutes offered in the service block, in comparison to the ILECs' basic local service plans.

If all of USCC's plans are evaluated, even though the additional regional and nationwide plans contain long distance and expanded calling, and depending on the USCC plan selected, USCC's customers will pay not only the block of time rate ranging from a low of \$35.00 for only 200 or 500 minutes to a high of \$200 for 2000 or 3300 minutes, depending on the regional or nationwide plan selected. If the block of time minutes are exceeded, the customer will also pay additional per-minute charges ranging from 30 cents to 40 cents per-minute. Again, none of USCC's additional rate plans are reasonably comparable to the ILECs' local service plans, and therefore USCC has not demonstrated how the public will benefit from its proposed service offerings.

¹⁴ This estimate was derived from an analysis of the originating and terminating local usage for Chouteau, Totah and Pine Telephone Companies.